

FILED  
Clerk  
District Court

FEB 14 2006

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

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Attorney for Saipan Handicraft.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS**

SAIPAN HANDICRAFT,

Plaintiff,

vs.

MICRONESIA WOODCRAFT ENT.,  
INC.; TIRZO J. ADRIATICO,  
individually and as President of  
Micronesia Woodcraft Ent., Inc.;  
and JOHN DOES 1-40,

Defendants.

Civil Action No. 05-0040

**PLAINTIFF'S CONFERENCE  
STATEMENT**

Date: February 14, 2006

Time: 10:00 a.m.

Judge: Honorable Alex R. Munson

Pursuant to LR 16.2CJ(e)(2) Plaintiff hereby submits the following in anticipation of the Case Management Conference:

**(a) Service of Process**

Service of Process has been accomplished on all identified defendants, Micronesia Woodcraft Ent., Inc. and Tirzo Adriatico.

**(b) Jurisdiction and Venue**

Plaintiff and served Defendants admit that jurisdiction and venue is properly placed with this Court.

**(c) Anticipated Motions**

Motion to Amend Pleadings (to add three new named defendants);

Motion to Strike Affirmative Defenses:

Various Discovery Motions

*Plaintiff's Conference Statement -- Page 1 of 2*

**ORIGINAL**

Motion to Show Cause

Motion for Summary Judgment

Motion for Preliminary Injunction against added defendants

**(d) Special Procedures**

Future preliminary injunction motions may be able to be consolidated with the trial on the merits.

**(e) Anticipated Discovery**

Discovery should not be limited. Plaintiff expects to submit/use the following:

1. Interrogatories
2. Depositions
3. Requests for Admissions
4. Production of Documents

**(f) Modification to Standard Procedures**

Plaintiff believes that there maybe a need to take the depositions of more than ten fact witnesses.

**(g) Settlement**

No settlement discussions have taken place, but due to the unwillingness of Defendants to stop producing dolls that violate the trademarks and dress of Plaintiff and/or order of this court settlement seems impossible.

**(h) Other Matters**

With an amended complaint pending, issues should not be limited at this time and matters should not be defined at this early date.

Respectfully submitted this 2/14/06.

  
F. MATTHEW SMITH  
Attorney for Plaintiff